

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| UNITED STATES OF AMERICA | : | DATE FILED: _____ |
| v. | : | CRIMINAL NO. : _____ |
| MICHAEL LUCIDONIO | : | VIOLATION: |
| BARBARA JANE HENRY, | : | 18 U.S.C. § 371 (conspiracy- 1 count) |
| a/k/a “Barbara Jane Kauffman” | : | 18 U.S.C. § 471 (forging counterfeit |
| NATHAN MOYER | : | currency - 1 count) |
| | : | 18 U.S.C. § 472 (possession of counterfeit |
| | : | currency - 1 count) |
| | : | 18 U.S.C. § 2 |
| | : | (aiding and abetting) |
| | : | 18 U.S.C. § 492 (criminal forfeiture) |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about October 2004, through on or about November 4, 2004, in the Eastern District of Pennsylvania and elsewhere, defendants

MICHAEL LUCIDONIO, and
BARBARA JANE HENRY,
a/k/a “Barbara Jane Kauffman,”
NATHAN MOYER,

conspired and agreed, together and with others known and unknown to the grand jury, to:

(1) falsely make, forge, and counterfeit obligations and securities of the United States, that is, counterfeit currency with intent to defraud, in violation of Title 18, United States Code, Section 471; and

(2) pass and keep in possession falsely made, forged, and counterfeited obligations and securities of the United States, that is, counterfeit currency with intent to defraud, in violation of Title 18, United States Code, Section 472.

MANNER AND MEANS

It was part of the conspiracy that:

1. Defendants MICHAEL LUCIDONIO, BARBARA JANE HENRY, and NATHAN MOYER used a computer to manufacture more than \$5,000 in counterfeit United States Currency (Federal Reserve Notes or “FRNs”) in twenty dollar and ten dollar bill denominations.

2. Defendants MICHAEL LUCIDONIO, BARBARA JANE HENRY, NATHAN MOYER, and others known and unknown to the grand jury passed and possessed with intent to defraud the counterfeit United States Currency in twenty dollar and ten dollar bill denominations.

Overt Acts

On or about the dates set forth below, in order to achieve the objects of the conspiracy, defendants and other persons known and unknown to the grand jury committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or about October 2004, defendants MICHAEL LUCIDONIO, BARBARA JANE HENRY, and NATHAN MOYER used a computer to manufacture more than \$5,000 in counterfeit United States Currency (Federal Reserve Notes or “FRNs”) in twenty dollar and ten dollar bill denominations.

2. In or about October 2004, defendant MICHAEL LUCIDONIO passed counterfeit United States currency with intent to defraud.

3. In or about October 2004, defendant BARBARA JANE HENRY passed counterfeit United States currency with intent to defraud.

4. In or about October 2004, defendant NATHAN MOYER passed counterfeit United States currency with intent to defraud.

5. On or about November 4, 2004, defendant MICHAEL LUCIDONIO possessed counterfeit United States currency with intent to defraud.

6. On or about November 4, 2004, defendant BARBARA JANE HENRY possessed counterfeit United States currency with intent to defraud.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about October 2004, in the Eastern District of Pennsylvania, defendants

**MICHAEL LUCIDONIO, and
BARBARA JANE HENRY,
a/k/a “Barbara Jane Kauffman,”
NATHAN MOYER,**

with intent to defraud, falsely made, forged, and counterfeited, and aided and abetted the false making, forging and counterfeiting of, obligations and securities of the United States, that is, counterfeit United States Currency (Federal Reserve Notes or “FRNs”) in twenty dollar and ten dollar bill denominations by the use of a computer.

In violation of Title 18, United States Code, Sections 471 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2004, in the Eastern District of Pennsylvania, defendant

MICHAEL LUCIDONIO

with intent to defraud, possessed falsely made, forged, and counterfeited obligations and securities of the United States, that is, counterfeit United States Currency (Federal Reserve Notes or “FRNs”) in ten dollar bill denominations.

In violation of Title 18, United States Code, Section 472.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2004, in the Eastern District of Pennsylvania, defendant

**BARBARA JANE HENRY,
a/k/a “Barbara Jane Kauffman,”**

with intent to defraud, possessed falsely made, forged, and counterfeited obligations and securities of the United States, that is, counterfeit United States Currency (Federal Reserve Notes or “FRNs”) in ten dollar bill denominations.

In violation of Title 18, United States Code, Section 472.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 471, and 472, as set forth in this indictment, defendants

**MICHAEL LUCIDONIO,
BARBARA JANE HENRY,
a/k/a “Barbara Jane Kauffman,” and
NATHAN MOYER,**

shall forfeit to the United States of America all counterfeits of any obligations or other securities of the United States; any articles, devices, and other things made, possessed, or used to falsely make, forge, counterfeit, pass, and possess counterfeits of obligations or other securities of the United States; and any material and apparatus used and fitted and intended to be used in the making of such counterfeits, that is, counterfeit United States Currency (Federal Reserve Notes or “FRNs”).

All pursuant to Title 18, United States Code, Section 492.

A TRUE BILL:

FOREPERSON

**PATRICK L. MEEHAN
United States Attorney**